



4241 State Office Building • Salt Lake City, UT 84114 • 801-533-5771

November 1, 1983

Mr. Kent Dahlquist Mining Engineer Union Carbide Corporation Metals Division La Sal, Utah 84530

> RE: Wilson-Silverbell Mine Plan Revision Union Carbide Corporation ACT/037/027 San Juan County, Utah

Dear Mr. Dahlquist:

Union Carbide's September 22, 1983 response to the Division's mine plan update requests has been received and reviewed. The majority of our concerns have been adequately addressed and the request for an increase in 22 acres of disturbance is being considered. However, the following will still need to be satisfied prior to approval of this amendment:

The specific acreage for which additional topsoil is needed the depth of replacement and this volume of topsoil which will need to be replaced in the areas around the waste dumps (where it was not removed) should be estimated at this time and a likely source of supply provided. The approximate purchase of topsoil should be established for bonding calculations.

There was no cost breakdown other than totals. It is difficult to determine how the reclamation costs were derived. Were the rates used for estimating, costs to the operator or cost to the regulatory authority? The standard cost index used by the Division is the Rental Rate Blue Book and the Means Site Cost Index.

No narrative accompanied the changes from the previously submitted bond estimate and therefore the following questions arise:

- 1. The removal of the headframe will entail dismantling. Will the structure be removed to a dump? Where? How was \$30,000 derived?
- Will the service, mill and office facilities be removed from the site? To where? Will the foundations be buried? How deep?

Mr. Kent Dahlquist ACT/037/027 October 31, 1983 Page 2

- 3. The removal of trash and debris was \$10,000 and is now \$2,000. Please explain.
- 4. Why did the acreage for earthwork change form 35 acres to 28 acres? Please explain.
- 5. Regarding the stabilization, please explain how the cost per acre was \$300 per acre before and is now \$150/acre.
- 6. What is the difference between vertical shafts on the previous estimate and the boreholes? How will they be reclaimed?
- 7. What hazardous materials will be removed? How will they be removed for \$500.
- 8. The monitoring was revised from \$5400 to \$15,000. Will the monitoring be for vegetation and groundwater? Please elaborate.

Thank you for taking care of the issues discussed on site last spring. The Division will look forward to your earliest response. If there are any questions please do not hesitate to call.

Sincerely,

THOMAS N. TETTING

ENGINEERING GEOLOGIST

TNT/jvb

cc: Pam Grubaugh-Littig, DOGM Tom Portle, DOGM